

The Honorable Barbara J. Rothstein

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON - SEATTLE**

RICARDO SALOM, CATHERINE PALAZZO as assignee for Ruben Palazzo, and PETER HACKINEN, *on their own behalf and on behalf of other similarly situated persons*,

Plaintiffs,

VS.

NATIONSTAR MORTGAGE LLC

And

FEDERAL HOME LOAN MORTGAGE
CORPORATION, *on its own behalf and on
behalf of similarly situated persons*

Defendants.

Case No. 2:24-cv-00444-BJR

**EXHIBIT B TO
PLAINTIFFS' OPPOSITION TO
NATIONSTAR'S MOTION FOR
JUDGMENT ON THE PLEADINGS**



PO Box 619098
Dallas, TX 75261-9741

OUR INFO
ONLINE
www.rightpathservicing.com

Ruben Palazzo
34811 Old Ocean City Rd
Pittsville, MD 21850

February 24, 2023

ACCOUNT INFO

LOAN NUMBER: [REDACTED]

CASE NUMBER: 0006281056

PROPERTY ADDRESS:

34811 Old Ocean City Rd
Pittsville, MD 21850

MORTGAGOR:

Ruben Palazzo

Dear Ruben Palazzo:

We received your letter on February 10, 2023, and we are sharing with you what we found after an investigation into your concerns.

After reviewing your account, we found that the mailing address was changed when the file became litigated while Community Loan Servicing, LLC (Community) was servicing the loan. Since the loan was in an Active Litigation status and you were represented by counsel, the address was changed to ensure that no direct communication was sent to you as you were represented by counsel. The loan transferred to Nationstar Mortgage LLC d/b/a RightPath Servicing effective June 1, 2022. At the time of the servicing transfer, the mailing address on the account was in care of Houser LLP, 9970 Research Drive, Irvine, CA 92618, who handles the litigation in coordination with local counsel, Miles & Stockbridge P.C.

As you requested, our records indicate that the Federal Home Loan Mortgage Corporation (Freddie Mac) as owner, is the current owner of the Note. We have provided their address and phone number below:

Federal Home Loan Mortgage Corporation (Freddie Mac)
8200 Jones Branch Drive
McLean, VA 22102-3110
1.800.373.3343

RightPath Servicing is the servicer of the loan and will be responsible for responding to any concerns regarding the servicing of the loan. Servicing matters include but are not limited to the following:

- Payment assistance and modifications
- Payment posting
- Validation of the debt
- Foreclosure proceedings
- Payment adjustments

RightPath ServicingSM and Mr. Cooper® are brand names for Nationstar Mortgage LLC.





Please direct any communication related to these matters to us using the contact information below. The Federal Home Loan Mortgage Corporation as owner will not be able to assist with any of these matters.

As you requested, enclosed are the following:

- All Mortgage Loan Statements from the time we began servicing the loan;
- Most recent Escrow Statement;
- Community Transfer of Servicing Notice;
- RightPath Servicing Welcome Letter;
- Transaction History;
- Form 1098.

We are informed that you have received a bankruptcy discharge. Communications from RightPath Servicing are for informational purposes only and not an attempt to collect a debt from you personally.

Please note that it is reflected on both the Community Transfer Notice (page two [2] under Annual Statements) and the top of the Form 1098 that you will only receive one (1) 1098 reflecting the interest paid to both Community and RightPath Servicing in 2022.

Our license number to do business in the state of Maryland is 2119.

Please be informed that we removed the code that did not permit communication with you, and submitted a request to change the mailing address in our system to the property address.

Some information you have requested does not pertain directly to the servicing of the loan, does not identify any specific servicing errors, and/or is considered proprietary and confidential. Therefore, this information is considered outside the scope of information that must be provided.

As of the date of this letter, your account is current and next due for the March 1, 2023, monthly installment in the amount of \$856.83. Your letter states that you did not receive notice concerning the increased monthly payments. As a courtesy, RightPath Servicing has credited \$20.25 to your escrow account to make up for the difference between your \$850.08 payments and the \$856.83 that should have been paid on December 1, 2022, January 1, 2023, and February 1, 2023.

RESPA RESPONSE TO NOTICE OF ERROR

Under applicable federal law, we are required to inform you that after completing a reasonable investigation into the issues described above, it has been determined that no error occurred because no direct communication was permitted due to the active litigation on the account. You have the right to access the documents we used in this investigation and we have enclosed them. Those documents are:

- Mortgage Loan Statements (8)
- Most Recent Escrow Statement
- Community Transfer of Servicing Notice



- RightPath Servicing Welcome Letter
- Transaction History
- Form 1098

If you have any additional questions, please contact our Customer Service Department at 1.833.685.2589 or via mail at the address above. Our hours of operation are Monday through Thursday from 7 a.m. to 8 p.m. (CT), Friday from 7 a.m. to 7 p.m. (CT) and Saturday from 8 a.m. to 12 p.m. (CT). Visit us on the web at www.rightpathservicing.com for more information.

Sincerely,

A handwritten signature in black ink that reads "Mary Portner".

Mary Portner
Customer Relations Specialist
RightPath Servicing
PO Box 619098
Dallas, TX 75261-9741
E-mail: mary.portner@mcooper.com

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By U.S. Standard Mail and Email: cathypalazzo@live.com

Are you experiencing a financial hardship? Our local non-profit partners can help with financial counseling and other services. Please visit these websites for assistance:

- Hud.gov
- Neighborworks.org